



December 19, 1983

Mr. Benjamin E. White
Total Petroleum, Inc.
East Superior Street
Alma, Michigan 48801

Dear Mr. White,

On December 9, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at Alma, Michigan to evaluate compliance of that facility with requirements of Act 64 as amended. Enclosed is a copy of the completed inspection form.

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Act 64. Specifically, staff found that:

1. 40CFR265.16 Personnel training - Although employees have received general hazard training, no program is in place to train employees as to the site-specific hazardous wastes at the Alma facility. No evidence that new employees or transferred employees are trained within six months.
2. Rule 407 Spill and accident prevention plan - Employee training records not included in the plan. No written inspection schedule for monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment. Employees have not been trained in the provisions of the plan.
3. Rule 408 (2) Contingency plan - Employee training program not included.
4. Rule 901 Operating log - Although much of information required is available in various other documents no defined operating log was available.
5. Rule 405 Run off diversion structures - Inadequate diking at the southeast corner of the landfill. This deficiency was noted in the last inspection but was not repaired due to wet ground.
6. Rule 803 (3) (a) Truck labeling. - One truck was observed that did not have the label on the waste hauling portion of the vehicle.

Page Two
December 19, 1983
Mr. Benjamin E. White

You should respond to this letter by January 9, 1984 providing documentation to this office regarding specific actions taken to correct these violations. For proposed actions include a time schedule for completion of each action.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch, Supervisor
Lansing District
517-322-1300

REB:mj

enclosure

cc: Hazardous Waste Division
U.S. EPA - Region V